

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Bienvenido I. Lugo-Marchant  
Plaintiff,

Civil Action No. 05 11317 NMG

v.

Peter Tsickritzis, Kevin Kingston,  
and United Liquors Limited et al.,  
Defendants

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**FIRST SET OF INTERROGATORIES PROPOUNDED BY THE PLAINTIFF TO  
DEFENDANT-James Tye**

Plaintiff, Bienvenido I. Lugo-Marchant, hereby propounds the following interrogatories to Defendant, James Tye, to be answered fully, separately, in writing and under oath.

**INSTRUCTIONS**

In answering these interrogatories, Defendant- James Tye, should follow the same instructions given to the Plaintiff when demanding from him answers to the **First Set of Interrogatories** sent by their legal representatives and counsel.

**DEFINITIONS**

As used herein, the terms used in these interrogatories shall have the same meaning as in the terms given to the Plaintiff when demanding from him to answer a **First Set of Interrogatories** by the defendants, their legal representatives and counsel. New terms that are not understood can be found at any legal or regular dictionary.

**INTERROGATORIES**

1. With respect to the person answering these Interrogatories, please state:
  - a. Name
  - b. Address (es)
  - c. Residence telephone numbers
  - d. Job title
  - e. Name of superiors
  - f. Date when started employment with the defendant
  - g. Salary
  - h. Marital status [name of spouse].
2. Please state how are the company's policies disseminated to all the employees
3. State whether the defendant ever submitted false information in connection with the plaintiff, and, if so explain the action in complete detail.
4. Please state how are the company's policies enforced and identify those involved in such enforcement

5. Does the defendant have any corporate policy that sets forth standards regarding employment treatment of other employees and acceptable behavior while at work?
6. State if the defendant simply treats some people less favorably than others because of their:
  - a. Race,
  - b. Color,
  - c. Sex,
  - d. Religion,
  - e. National origin, or
  - f. Disability (ies)
7. Was any written report compiled or prepared as a result of examination, tests, or analysis related to this action, and, if so, state
  - a. Subject matter [nature]
  - b. Who suggested to prepare it
  - c. Location, and
  - d. Persons who prepared it
8. Please state whether the EEOC, MCAD, Braintree Fire Department, was ever notified of the working conditions at the defendant's company.
9. Please state the defendants' policy regarding transfer, promotion, demotion and harassment.
10. State whether or not the defendant made derogatory statements about the plaintiff because of the nature of this lawsuit.
11. State if you ever met with Dexter Simon Cooper, and if so, further, state:
  - a. If the defendant shared some libations after conferencing with him
  - b. If the defendant shared libations with someone else in a similar fashion, and
  - c. What was the substance of the talking with him/her
12. State whether or not the defendant would now hire the plaintiff. Further state if the plaintiff, if hired, would be required to work on Saturday or when having any religious observance.
13. State your ethnic background, race and religion
14. State your gross income since 1985 to the present

**CERTIFICATE OF SERVICE**

I hereby certify that on July 21 2006, this document was served upon the defendant's counsel JACKSON LEWIS, by first class mail, postage paid.

Respectfully submitted, Bienvenido I. Lugo-Marchant  
Pro se, in forma pauperis

